

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE**

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<b>WANDA FAYE JONES,</b>	)	
<b>KELLY DORRIS PENDERGRASS, and</b>	)	
<b>TIFFANY SHEA JONES,</b>	)	
	)	
<b>Plaintiffs,</b>	)	<b>Case No. 3:12-cv-0203</b>
	)	
<b>vs.</b>	)	<b>Judge Nixon</b>
	)	
<b>ELITE EMERGENCY SERVICES, LLC, and</b>	)	<b>Magistrate Judge Knowles</b>
<b>SAMUEL C. CLEMMONS, and</b>	)	
<b>SHANNON CLEMMONS, Individually and</b>	)	<b>JURY DEMAND</b>
<b>d/b/a Elite Emergency Services, LLC,</b>	)	
	)	
<b>Defendants.</b>	)	

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**REQUEST FOR PERMISSION FOR LEAVE TO FILE SHORT REPLY**

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Pursuant to the Federal Rules of Civil Procedure, specifically Local Rule 7.01(b) for the Middle District of Tennessee, Plaintiffs request permission for leave to file a short reply to Defendants' Response in Opposition to Plaintiffs' Motion for Entry of Final Judgment filed December 29, 2014 (Doc. 159).

Plaintiffs would state that in the interest of justice a short reply should be allowed for the purpose of correcting and/or clarifying certain significant mischaracterization(s), misrepresentation(s), and/or mistake(s) contained in Defendants' Response in Opposition, including, but not limited to, Defendants' misstatement of Plaintiffs' legal position(s). In support of this request, Plaintiffs would state that their counsel, Trevor W. Howell, has been out of state and requires this time period within which to reply. If this request is granted, Plaintiffs will file said reply no later than Wednesday, January 14, 2015. Plaintiffs request that the court not rule on Plaintiffs' pending

Motion for Entry of Final Judgment until Plaintiffs have had the opportunity to file a short reply and the Court has had an opportunity to review said reply.

Respectfully submitted,

/s/ Trevor W. Howell

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## **CERTIFICATE OF SERVICE**

I hereby certify that on this 6<sup>th</sup> day of January, 2015, a copy of the foregoing *Request For Permission For Leave To File Short Reply* was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system.

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*/s/ Trevor W. Howell*  
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